

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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W. MICHAEL CAHILL,

Plaintiff

v.

VERIZON/SYSTEM COUNCIL T6/
LOCAL 2222 IBEW,

Defendants

Civil Action No. 04-11986-MEL
DISTRICT COURT
DISTRICT OF MASS.

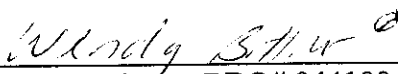
MOTION TO DISMISS OF DEFENDANTS
SYSTEM COUNCIL T-6 AND LOCAL 2222, IBEW

Defendant System Council T-6 (herein, "Defendant System Council") and Defendant Local 2222, IBEW (hereinafter "Defendants Local" and collectively herein "Defendants") move to dismiss the complaint in the above-captioned matter on the grounds that it fails to state a claim upon which relief may be granted. Fed. R. Civ. P. 12(b)(6). As grounds for this motion, the Defendants state that the claim is barred by the applicable statute of limitations, that Defendant System Council is not alleged to have engaged in any conduct, and that Defendant's did not engage in any wrongful conduct. The Defendants submit the attached Memorandum of Law in support of this motion.

Respectfully submitted,

SYSTEM COUNCIL T-6 and LOCAL 2222, IBEW
By Their Attorney

Date: November 29, 2004

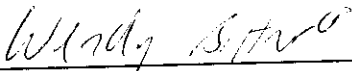

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document, Motion to Dismiss of Defendants System Council T-6 and Local 2222, IBEW, was served upon the following via first-class mail, postage prepaid, on November 29, 2004:

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